# Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

| This response relates to the proposed modification | |
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| **MM 33** | **WS** |
| **(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)** | |

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| **Declaration:** | I consider the proposed modification will assist the submitted Core Strategy to be found sound ☐ /unsound ☒ (*place a cross in the box to show which option you have chosen) for the following reasons: |

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| **Reasons Given:** | The modification to WCS12 as proposed only relates to the impact of recreational visits to the Ashdown Forest, not other daily activity and is intended to apply only to housing development. It proposes that SANGS be established, to provide, where possible, recreational facilities nearer to development and so remove the need to visit the forest.<br>This policy will never be able to actually stop visits to the forest from those living within the new 7km zone and so its effectiveness must be questionable.<br>Many alternatives already exist for recreational use by local people and in particular dog owners within the 7km zone. The Wealden area is covered in footpaths and open areas which do not require travel to the forest.<br>The reason for this policy is also unclear from the evidence produced by Wealden District Council (WDC). There is no finding that bird breeding success is related to visitors or associated predators (dogs) and that being the case it is difficult to demonstrate that this policy is necessary.<br>What is clear is that the policy is not to prevent:<br>• development of housing within the 7km zone<br>• development of housing within the 7km zone where SANGS/management mitigation or associated S106 contribution is provided<br>• development of housing within the 7km zone where adequate alternative recreational space is already in place and can be assessed as an equivalent to new SANGS<br>• development in any other form, commercial or social<br><br>The policy is clear, even if its requirement is very debatable, yet WDC has already used it to refuse development where it has failed to implement either SANGS or to seek a contribution under a Section 106 Planning Obligation.<br><br>Again it is also clear that the policy is not to prevent development of housing within the 7km zone on account of the impacts of nitrogen deposition.<br><br>The policy indicates that not until 2015/16 will Wealden undertake the necessary research into nitrogen deposition. In the meantime the issue of nitrogen deposition should be assessed using the DRMB procedure for daily traffic. This has shown that no excess beyond 1000AADT on appropriate routes will occur as a consequence of the Core Strategy. This assessment process was confirmed by Natural England and the Inspector who supported its use during the evolution of and evidence for the Core Strategy. As previously submitted there is sufficient headroom to develop further housing, for instance up to 170 in Maresfield, i.e. without breaching the threshold.<br><br>The ongoing use of the DMRB process is accepted by Natural England where there can be no policy on this matter (where no known mitigation is available).<br><br>Despite this, WDC has already recommended refusal for applications stating that any traffic that results from ANY development within the 7km zone will have an impact and so will be refused.<br><br>For the above reasons the policy and actions of WDC are unsound. |

# Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

| This response relates to the proposed modification | |
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| **MM** | **WS 35** |
| **(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)** | |

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| **Declaration:** | I consider the proposed modification will assist the submitted Core Strategy to be found sound ☐ /unsound ☒ (*place a cross in the box to show which option you have chosen) for the following reasons: |

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| **Reasons Given:** | The modification to WCS12 as proposed only relates to the impact of recreational visits to the Ashdown Forest, not other daily activity and is intended to apply only to housing development. It proposes that SANGS be established, to provide, where possible, recreational facilities nearer to development and so remove the need to visit the forest.<br>This policy will never be able to actually stop visits to the forest from those living within the new 7km zone and so its effectiveness must be questionable.<br>Many alternatives already exist for recreational use by local people and in particular dog owners within the 7km zone. The Wealden area is covered in footpaths and open areas which do not require travel to the forest.<br>The reason for this policy is also unclear from the evidence produced by Wealden District Council (WDC). There is no finding that bird breeding success is related to visitors or associated predators (dogs) and that being the case it is difficult to demonstrate that this policy is necessary.<br>What is clear is that the policy is not to prevent:<br>• development of housing within the 7km zone<br>• development of housing within the 7km zone where SANGS/management mitigation or associated S106 contribution is provided<br>• development of housing within the 7km zone where adequate alternative recreational space is already in place and can be assessed as an equivalent to new SANGS<br>• development in any other form, commercial or social<br><br>The policy is clear, even if its requirement is very debatable, yet WDC has already used it to refuse development where it has failed to implement either SANGS or to seek a contribution under a Section 106 Planning Obligation.<br><br>Again it is also clear that the policy is not to prevent development of housing within the 7km zone on account of the impacts of nitrogen deposition.<br><br>The policy indicates that not until 2015/16 will Wealden undertake the necessary research into nitrogen deposition. In the meantime the issue of nitrogen deposition should be assessed using the DRMB procedure for daily traffic. This has shown that no excess beyond 1000AADT on appropriate routes will occur as a consequence of the Core Strategy. This assessment process was confirmed by Natural England and the Inspector who supported its use during the evolution of and evidence for the Core Strategy. As previously submitted there is sufficient headroom to develop further housing, for instance up to 170 in Maresfield, i.e. without breaching the threshold.<br><br>The ongoing use of the DMRB process is accepted by Natural England where there can be no policy on this matter (where no known mitigation is available).<br><br>Despite this, WDC has already recommended refusal for applications stating that any traffic that results from ANY development within the 7km zone will have an impact and so will be refused.<br><br>For the above reasons the policy and actions of WDC are unsound. |

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| **If this is a new matter that you have raised please complete the following**<br><br>I wish ☒ / do not wish ☐ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector | |
| **Signed:** | |
| **Name and Address:** | S Baynes Clarke |
| **E-Mail Address:** | |
| **If on behalf of a** | |

| | |
|---|---|
| **company, please state:** | |
| **Date:** | 12/06/2012 |

| **Please place a cross in the box to show which option you have chosen** | |
|---|---|
| I would wish to be notified of the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy | Yes ☒<br>No ☐ |
| I would wish to be notified of the adoption of the Core Strategy | Yes ☒<br>No ☐ |

**Note:** If completing this in hardcopy form, please use additional sheets if necessary.

Please return this form by **5pm on Wednesday 13th June 2012**:

**By post to: Head of Planning and Environmental Policy, Wealden District Council, Freepost SEA 10959, Crowborough, East Sussex, TN6 1BR**

**By email to: ldf@wealden.gov.uk**

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended, requires copies of all representations to be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. By submitting a representation on the Proposed Modifications you confirm that you agree to this and accept responsibility for your comments.

Please telephone 01892 602007 or e-mail ldf@wealden.gov.uk if you require assistance in submitting your representation or if further information is required. If you, or somebody you know, would like the information (guidance notes, forms etc) in large print, braille, audio tape/CD or in another language please let us know.